

ECF CASE  
JUDGE HELLERSTEIN

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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**J & J SPORTS PRODUCTIONS, INC.,** as  
Broadcast Licensee of the **May 5, 2007**  
**DeLaHoya/Mayweather** Program

Plaintiff,

-against-

761 BLUE LAGOON CORP. d/b/a BLUE  
LAGOON a/k/a BLUE 761 LAGOON a/k/a BLUE  
LAGOON

Defendants.  
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**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

Civil Action No. 07-CV-6527-AKH-FM  
HON. ALVIN K. HELLERSTEIN

**PLEASE TAKE NOTICE** that upon the affirmation of Julie Cohen Lonstein, sworn to on the 15<sup>th</sup> day of November 2007, in support of said application and the exhibits attached thereto, Plaintiff moves this Court for an order granting the entry of default judgment against the Defendants jointly and severally as follows:

**Against, 761 BLUE LAGOON CORP. d/b/a BLUE LAGOON a/k/a BLUE 761 LAGOON a/k/a BLUE LAGOON,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of ONE THOUSAND THREE HUNDRED ELEVEN DOLLARS AND FIFTY CENTS (\$1311.50)

Dated: November 15, 2007  
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein

Julie Cohen Lonstein

Bar Roll No. JL8521

Attorney for Plaintiff

1 Terrace Hill; PO Box 351

Ellenville, NY 12428

Telephone: 845-647-8500

Facsimile: 845-647-6277